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10 Attorneys for CN Utility Consulting, Inc.,
Cupertino Electric, Inc., Wright Tree Service,
11 Inc., and Wright Tree Service of the West, Inc.

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re:
16 PG&E CORPORATION and PACIFIC GAS AND
17 ELECTRIC COMPANY,

18 Debtors,

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 ** All papers shall be filed in the Lead Case, No.*
23 *19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

**OBJECTION OF CN UTILITY
CONSULTING, INC., CUPERTINO
ELECTRIC, INC., WRIGHT TREE
SERVICE, INC., AND WRIGHT TREE
SERVICE OF THE WEST, INC. TO THE
[PROPOSED] DISCLOSURE
STATEMENT FOR DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION**

Date: March 10, 2020
Time: 10:00 a.m. (PST)
Place: Courtroom 17
450 Golden Gate Avenue, 16th Floor
San Francisco, CA 94102

1 CN Utility Consulting, Inc., Cupertino Electric, Inc., Wright Tree Service, Inc., and Wright
2 Tree Service of the West, Inc. hereby submit their Objection to the *[Proposed] Disclosure Statement*
3 *for Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization* [Dkt. No. 5700]
4 (the “**Disclosure Statement**”):

5 The Disclosure Statement fails to disclose adequate information related to:

- 6 • The value of the Assigned Claims.¹
- 7 • The effect of the (i) apparently improper issuance of subpoenas by the TCC and (ii)
8 proposed assignment of the Assigned Claims to the TCC on the ability of the Debtors
9 to provide safe and reliable services, including the ability of Safety and Reliability
10 Service Providers to obtain adequate insurance coverage.

11 Respectfully submitted,

12 MICHAEL B. LUBIC
13 MATTHEW G. BALL
14 ARMANDO V. ARBALLO
K&L GATES LLP

15 Dated: March 6, 2020

By: /s/ Michael B. Lubic

Michael B. Lubic

16 Attorneys for CN Utility Consulting, Inc.,
17 Cupertino Electric, Inc., Wright Tree Service,
18 Inc., and Wright Tree Service of the West, Inc.

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27 ¹ While the TCC has stated that these claims form a “substantial portion of the consideration received by the TCC” [Dkt.
28 No. 5840, 2:14-15], the Debtor has stated that the value of the claims is not material [Dkt. No. 5995, 2:20-23].